

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

In re Application of

FourWorld Event Opportunities Fund, L.P. for
an order, pursuant to 28 U.S.C. § 1782, Granting
It Leave To Obtain Discovery for Use in Foreign
Proceedings.

Case No. 1:22-mc-00330 (JPO)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed Declaration of Abby F. Rudzin, dated January 6, 2023, the exhibits attached thereto, and the accompanying Memorandum of Law, the undersigned hereby moves this Court on behalf of JPMorgan Chase & Co. (“Respondent”) before the Honorable J. Paul Oetken in Courtroom 706 of the United States District Court for the Southern District of New York, Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, for an order pursuant to Rule 45(d)(3) of the Federal Rules of Civil Procedure quashing the subpoenas served by FourWorld Event Opportunities Fund, L.P. (“Petitioner”), vacating the Court’s November 22, 2022 order granting Petitioner’s *ex parte* 28 U.S.C. § 1782 application, and granting such other relief as the Court deems just and proper.

Please also note that the parties have agreed to the following briefing schedule, subject to the Court’s approval: the Petitioner shall file their opposition by January 27, 2023, and Respondent shall file any reply by February 3, 2023.

Dated: January 6, 2023
New York, New York

Respectfully submitted,

O’MELVENY & MYERS LLP

By: /s/ Abby F. Rudzin

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Attorneys for Respondent JPMorgan Chase & Co.

The briefing schedule outlined above is
approved.

So ordered.


J. PAUL OETKEN
United States District Judge